

July 2, 2019 Marlene H. Dortch, Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington, D.C. 20554

Re: WT Docket No. 17-200

Michael Fitzpatrick Head of Regulatory Advocacy, GE Global Law & Policy

General Electric Company 1299 Pennsylvania Ave NW Washington, DC 20004 T +1 202 637 4462

Dear Ms. Dortch:

General Electric Renewables (GE Renewables) provide wireless devices to a broad variety of commercial and industrial entities. Its customers include utilities, oil/gas producers, pipeline companies, railroads, and factories. GE Renewables fully supports the Commission's efforts to ensure that America continues to lead the world in innovative wireless technologies, including the FCC's 5G FAST Plan. The company has committed significant resources to developing equipment consistent with the FCC's goal.

Because of the breadth of its customer base, GE Renewables is particularly interested in FCC initiatives that promise to make licensed spectrum available for private systems. Its equipment portfolio extends beyond communications devices that are deployed on commercial networks. It includes those used by industrial enterprises for internal communications, often within a campus or other geographically limited area. These transmissions are related to the monitoring and control of operations assets and processes. While these entities often use carrier networks for certain applications, many applications require a higher level of security, reliability, and resiliency than typically found on a commercial system. Additionally, commercial systems do not always provide reliable coverage in the various remote, rural, and hard to reach locations where many industrial assets are located.

For this reason, GE Renewables supports the FCC's proposal to create a 900 MHz Private Enterprise Broadband (PEBB) segment that will target the communications needs of industrial operations in a band with highly favorable propagation and penetration characteristics. It would provide our customers with a private broadband option for a system that is not tied to the Internet and, therefore, is less susceptible to cybersecurity problems. Of course, our support is contingent on rules that establish a band realignment process that guarantees comparable facilities for incumbents with costs paid by the broadband licensee.

Very truly yours,
/s/
Michael Fitzpatrick